

Date: March 29, 2013

To: FCC

From: Dan Hall, Commercial pilot and aircraft owner

Reference; WT Docket No. 01-289, FCC 13-2

I strongly oppose the FCC's proposed ban on the certification, manufacture, sale, or use of 121.5MHz ELT's. This will force pilots to switch to use of 406 MHz ELT's, which will increase costs and regulation, hinder development and use of better and improved safety related technologies, and conflicts with existing laws. The FAA, NOT the FCC should be leading and making any such policy directly affecting General Aviation safety.

Neither the 121.5 MHz nor the 406 MHz technologies are 100% reliable. There are already multiple alternatives either in the market or coming to market, with advancements that have advantages to or which may prove to be superior to the proposed and costly 406MHz ELT requirement. Contrary to outside perceptions, General Aviation users like myself typically have very tight budgets, and in most cases limited resources could be more effectively spent on other safety related products and services.

The proposed regulation also runs counter to FCC's mandate, by locking General Aviation and it's users into 2013 technology potentially for decades, as newer and better technologies become available. ADS-B and EPIRBs are examples of existing and new technological options to improve safety and communications. FCC's proposed requirement would stifle development of new technologies for GA.

I strongly oppose any proposal that would promote reliance on one specific technology, as in this case, the 406 MHz ELT. I believe aircraft owners are the best to decide—based on their type of operations and the terrain they overfly—what kind of emergency locator equipment to carry onboard the aircraft.

The ban would do nothing to make the use of the aeronautical spectrum more efficient because 121.5 MHz would remain the emergency broadcast frequency for pilots.

As for avoiding unnecessary regulation, the proposal itself is unnecessary. Making it a regulation would be absurd, and would run counter to existing statutes. Congress has that deemed the 121.5 MHz ELT meets the national statutory requirement of having an ELT onboard an aircraft.

The FAA is the authority for regulations affecting aviation and in this case is the correct agency to determine the outcome of this issue. “The FCC should still defer to the FAA on issues of aviation safety.

The 121.5 MHz ELT must remain a viable, affordable option for pilots.

Sincerely,

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